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August 3, 2017

**Via ECFS**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: Mid-Tex Cellular, Ltd.  
E911 Location Accuracy Implementation Plan and Progress Report  
PS Docket No. 07-114

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Mid-Tex Cellular, Ltd., is its E911 location accuracy implementation plan and progress report.

Should you have any questions, please contact undersigned counsel.

Sincerely,

*/s/ Michael R. Bennet*

Michael R. Bennet

Attachment

4832-8107-7302, v. 1

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of

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Wireless E911 Location Accuracy Requirements )

PS Docket No. 07-114

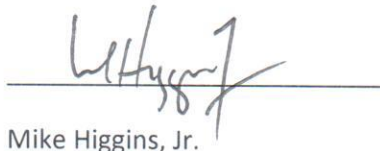
**Mid-Tex Cellular Ltd. E911 Implementation Plan and Initial Progress Report**

Mid-Tex Cellular Ltd. ("Mid-Tex"), pursuant to Section 20.18(i)(4)(i)-(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its location accuracy implementation plan and initial progress report.

Mid-Tex is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMAs. Mid-Tex entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable Mid-Tex to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). Mid-Tex has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(1) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

Although Mid-Tex complies with the current location accuracy benchmark, it has been working to improve its location accuracy by installing a new server, the first phase of which was completed during the last quarter of 2016. The first quarter of 2017 was spent optimizing accuracy and in the second quarter of 2017, Mid-Tex began the process of site certification with its local COGs and PSAPs.

Mid-Tex plans to continue to do further testing and site certification to determine if additional measures are necessary to meet applicable future indoor horizontal location accuracy benchmark, and then make network improvements and adjustments to existing sites as necessary. Because Mid-Tex does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Mike Higgins, Jr.

General Manager

Date: August 2, 2017